

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

MISSISSIPPI STATE CONFERENCE OF  
THE NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF COLORED  
PEOPLE; DR. ANDREA WESLEY; DR.  
JOSEPH WESLEY; ROBERT EVANS;  
GARY FREDERICKS; PAMELA  
HAMNER; BARBARA FINN; OTHO  
BARNES; SHIRLINDA ROBERTSON;  
SANDRA SMITH; DEBORAH HULITT;  
RODESTA TUMBLIN; DR. KIA JONES;  
MARCELEAN ARRINGTON; VICTORIA  
ROBERTSON,

*Plaintiffs,*

v.

STATE BOARD OF ELECTION  
COMMISSIONERS; TATE REEVES, *in his  
official capacity as Governor of Mississippi*;  
LYNN FITCH, *in her official capacity as  
Attorney General of Mississippi*; MICHAEL  
WATSON, *in his official capacity as  
Secretary of State of Mississippi*,

*Defendants,*

AND

MISSISSIPPI REPUBLICAN EXECUTIVE  
COMMITTEE

*Intervenor-Defendant.*

No. 3:22-cv-734-DPJ-HSO-LHS

**PLAINTIFFS' AMENDED NOTICE OF RULE 30(b)(6) DEPOSITION**  
**OF THE MISSISSIPPI SECRETARY OF STATE**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, counsel for Plaintiffs Mississippi State Conference of the National Association for the

Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith, Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Marcelean Arrington, and Victoria Robertson will proceed to take the deposition of the Mississippi Secretary of State through one or more officers, directors, managing agents, or other persons who shall be designated to testify on the Secretary of State's behalf regarding all information known or reasonably available to the Secretary of State with respect to the topics identified in **Exhibit A**. The deposition will be held on December 20, 2023 at 9:00 a.m., via secure web-based, remote deposition platform. The discovery deposition shall be taken before a stenographic reporter or other person duly authorized to administer oaths. The deposition will be taken by oral examination with a written and/or sound and visual record made thereof (e.g., videotape, LiveNote, etc.). Plaintiffs request that the Secretary of State provide written notice at least five (5) business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on the Secretary of State's behalf.

*[Signature Page Follows]*

Dated: December 13, 2023

/s/ Joshua Tom

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*Attorneys for Plaintiffs*

**EXHIBIT A**

**1. Policies, procedures, regulations, guidance, and training regarding the implementation of new state legislative district maps, including but not limited to:**

- a. Policies, processes, and procedures, as well as the time and staff required, for allocating voters to their districts by updating district information in Mississippi's voter registration database, and for requesting or mailing any notice or voter information cards to voters including their precinct information.
- b. Policies, processes, and procedures, as well as the time and staff required, for preparing the information to be printed on ballots; for proofing, revising, printing, and sending ballots, absentee ballots, and Uniformed Overseas Citizens Absentee Voting Act ("UOCAVA") ballots; and for qualifying candidates for office.

**2. Voting and voter registration procedures, including but not limited to:**

- a. Voting and voter registration requirements and policies, guidance, and regulations related to those requirements, including signature requirements, proof-of-residency requirements, requirements for changes of address, and distinctions between inter- and intra-county moves.
- b. Changes to voting or voter registration policies or procedures discussed or planned, and policies, guidance, and regulations related to such changes, for the 2024 election cycle.

**3. Election-related resource requirements and constraints, including but not limited to:**

- a. The election-related responsibilities of the Secretary of State's office during an election cycle.

- b. The number of polling locations that were changed or split from the beginning of the 2020 election cycle to present; processes and staffing for changing a polling location; and the availability of polling facilities for upcoming elections.

**4. The timing of previous election cycles, including but not limited to:**

- a. The procedures for and feasibility of moving the qualifying and/or primary dates for the 2024 election cycle and of conducting special state legislative elections in 2024.
- b. The State's experience and procedures for implementing newly drawn state legislative maps and for conducting special legislative elections during election cycles after 1990, including for implementing state legislative maps drawn in response to a court order.
- c. Election calendars for election cycles after 1990, and the timing, including deadlines and actual completion dates, of relevant processes regarding the implementation of new state legislative district maps for election cycles after 1990, including all necessary steps to implement state legislative district maps.
- d. Measures the State took to mitigate resource and time constraints related to the implementation of new state legislative maps during the 2023 election cycle, whether it anticipates the recurrence of any such constraints in future elections, and if, so, any measures the State plans to take to mitigate those constraints.
- e. Anticipated deadlines for 2024 election-related events, including but not limited to candidate filing deadlines, ballot production deadlines, nominating period deadlines, and voting periods.

**5. Voter participation in Mississippi, including but not limited to:**

- a. Data and information on voter registration and voter turnout rates in Mississippi, including at the county level and broken down by particular racial demographic groups.
- b. Data and information on racially polarized voting in Mississippi.
- c. Efforts by the Secretary of State to encourage voter registration and participation, including among Black Mississippians.
- d. The Secretary of State's role and activities in ensuring voting access in Mississippi, including through the provision of polling place information and other voting information to the public, and advising and furnishing resources and guidance to local boards of election commissioners regarding election administration.
- e. Voting policies and procedures in Mississippi, and the impact of those policies and procedures on Black voters, including: the availability of early and mail-in voting; voter information made available by the Secretary of State's office in advance of an election; lines at polling places; changes in polling places; the disenfranchisement of people with felony convictions; and the use of runoff elections.

**6. The Secretary of State's Office's participation in the process of drawing state legislative maps in 2022, including but not limited to:**

- a. Data, analyses, studies, or information created and/or provided by the Secretary of State's Office, including its employees, staff, and/or consultants, for use in the 2022 redistricting process.

- b. Any analysis or consideration of any maps created or provided by legislators, legislative staff, consultants, and/or the public as part of the 2022 redistricting process.
- c. Communications with legislators, legislative staff, consultants, and/or the public about the 2022 redistricting process.

**CERTIFICATE OF SERVICE**

I, Joshua Tom, do certify that I caused a true and correct copy of the foregoing to be filed on the Court's ECF system which sent notice to all counsel of record on this 13th day of December 2023.

/s/ Joshua Tom  
Joshua Tom